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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN TELUSMA,

Defendant.

CASE NO. 2:17-cr-00306-JCM-PAL-16

STIPULATION AND ORDER TO CONTINUE SENTENCING (FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Defendant, John Telusma, by and through his counsel, Crane M. Pomerantz, Esq., of the law firm of Clark Hill PLLC and the Plaintiff, United States of America, by and through David L. Jaffe, Chief for the United States Department of Justice, Organized Crime and Gang Section, Kelly Pearson, Deputy Chief, Organized Crime and Gang Section, and Chad W. McHenry and Alexander Gottfried, Trial Attorneys, Organized Crime and Gang Section, that the sentencing hearing currently scheduled for January 19, 2022, at 11:00 a.m. be vacated and set to a date and time convenient to the Court but not earlier than sixty (60) days.

This Stipulation is entered into for the following reasons:

1. Undersigned counsel was appointed by this Court as counsel for Mr. Telusma on March 12, 2018.
2. Sentencing in this matter is currently scheduled for January 19, 2022 at 11:00 a.m. Therefore, Mr. Telusma's sentencing memorandum is currently due on January 12, 2022.

3. Undersigned counsel is settling into his new office after joining the Clark Hill PLLC law firm on November 29, 2021, and is working on retrieving data from his previous firm, including pleadings and other information relating to this case. Moreover, a sentencing mitigation expert that he intended to retain was not available in the month of December.

4. Undersigned counsel requires additional time to thoroughly prepare for sentencing on Mr. Telusma's behalf, including the preparation of a sentencing memorandum on Mr. Telusma's behalf.

5. Counsel for the government is scheduled to begin a trial on February 1, 2022.

6. Mr. Telusma is not in custody and agrees to this short continuance. Mr. Telusma resides in New York; avoiding travel for his sentencing hearing will lessen his potential exposure to the COVID virus.

7. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.

8. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing hearing for good cause. Good cause exists in this case.

9. For all the above-stated reasons, the ends of justice would be best served by a short continuance of the sentencing hearing.

10. This is the first request for a continuance of the sentencing hearing.

UNITED STATES ATTORNEY
DISTRICT OF NEVADA

CLARK HILL PLLC

DATED this 6th day of January, 2022.

DATED this 6th day of January, 2022.

/s/ Chad McHenry
CHAD McHENRY
Trial Counsel for the Plaintiff,
UNITED STATES OF AMERICA

/s/ Crane M. Pomerantz
CRANE M. POMERANTZ
Attorney for Defendant,
John Telusma

UNITED STATES OF AMERICA, Plaintiff, vs. JOHN TELUSMA, Defendant.	CASE NO. 2:17-cr-00306-JCM-PAL-16
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1. Undersigned counsel was appointed by this Court as counsel for Mr. Telusma on March 12, 2018.

2. Sentencing in this matter is currently scheduled for January 19, 2022 at 11:00 a.m. Therefore, Mr. Telusma's sentencing memorandum and formal objections are currently due on January 12, 2022.

3. Undersigned counsel is settling into his new office after joining the Clark Hill PLLC law firm on November 29, 2021, and is working on retrieving data from his previous firm, including pleadings and other information relating to this case. Moreover, a sentencing mitigation expert that he intended to retain was not available in the month of December.

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DATED January 12, 2022.

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